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Attorneys for Respondents

UNITED STATES DISTRICT COURT
CLARK COUNTY, NEVADA

MARCELL WILLIAMS,

Petitioner,

vs.

TIMOTHY FILSON, et al.,

Respondents.

Case No. 3:17-cv-00180-RCJ-WGC

**MOTION FOR EXTENSION OF TIME
TO RESPOND TO PETITION FOR WRIT
OF HABEAS CORPUS (ECF NO. 6)**

(FIRST REQUEST)

Respondents move this Court for an extension of time of 30 days, up to and including October 12, 2017, in which to respond to Petitioner's Petition for Writ of Habeas Corpus (ECF No. 6). This Motion is made pursuant to Fed. R. Civ. P. 6(b) and Rule 6-1 of the Local Rules of Practice and is based upon the attached affidavit of counsel.

This is the first enlargement of time sought by Respondents and is brought in good faith and not for the purpose of delay.

DATED this 12th day of September, 2017.

Submitted by:

ADAM PAUL LAXALT
Attorney General

By: /s/ Jessica Perlick
JESSICA PERLICK (Bar. No. 13218)
Deputy Attorney General

DECLARATION OF JESSICA PERLICK

STATE OF NEVADA)
) ss:
COUNTY OF CLARK)

I, JESSICA PERLICK, being first duly sworn under oath, depose and state as follows:

1. I am an attorney licensed to practice law in all courts within the State of Nevada, and am employed as a Deputy Attorney General in the Office of the Nevada Attorney General. I have been assigned to represent Respondents in *Marcell Williams v. Timothy Filson, et al.*, Case No. 3:17-cv-00180-RCJ-WGC, and as such, have personal knowledge of the matters contained herein.

2. The Court issued its Order directing a response or other answer prior to my starting my position at the Attorney General's Office.

3. In addition to the instant case, I am responsible for approximately 50% of all state court habeas petitions that challenge time credits, with an average of 20-25 responses due per week. I am also responsible for certain non-time credit state petitions and direct appeals to the Nevada Supreme Court arising out of Attorney General prosecutions. I just completed a fast-track response and opening brief in the Nevada Supreme Court in the matter of *Isidro Baca v. Ronald M. Jayne*, case no. 72725, for which no further extensions were available. I also have ten more state responses to complete this week, along with an additional 20 for next week. Finally, although the response to Williams' petition is substantially complete, it must go through a review process prior to filing, and the person reviewing the filing is currently preparing for Ninth Circuit oral argument in an unrelated case.

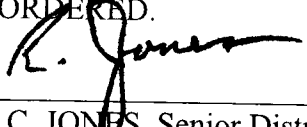
4. Therefore, Respondents request an extension of time of 30 judicial days to file a response to Petitioner's Petition for Writ of Habeas Corpus, through October 12, 2017.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on September 12, 2017.

/s/ Jessica Perlick
JESSICA PERLICK (Bar. No. 13218)

IT IS SO ORDERED.



ROBERT C. JONES, Senior District Judge
DATED: This 19th day of January, 2018.